

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____	:	
RHONDA HALL,	:	
	:	
Plaintiff,	:	
	:	
V.	:	Civil Action No. 3:05-cv-30002-MAP
	:	
VERIZON COMMUNICATIONS, INC.,	:	
and VERIZON NEW ENGLAND, INC.	:	
	:	
Defendants.	:	
_____	:	

MOTION OF PLAINTIFF RHONDA HALL
FOR AN EXTENSION OF TIME TO FILE OPPOSITION TO
DEFENDANTS' PENDING MOTIONS

The Plaintiff respectfully moves this Court for an extension of time until Monday, May 14, 2007 to file her opposition to the Defendant's pending motions. As grounds for this motion, Plaintiff states:

1. The Defendant has filed three separate motions. The first is a motion to disqualify Plaintiff's counsel on the grounds that he is a necessary witness due to two letters he sent to the Defendant's EEO officer during the course of his representation of the Plaintiff. The second is a motion *in limine* to exclude certain evidence of racist graffiti on the interior of a "cross box" maintained by the Defendants. The third is a motion to submit to the court any federal claim for back pay.
2. The Plaintiff's opposition to the Defendant's motion to disqualify Plaintiff's counsel is presently due on May 11, 2007 under the court's order dated May 4, 2007. Under the court's original scheduling order Motions *in limine* were not due until a week before the trial in this matter.

3. Prior to May 3, 2007, Plaintiff's counsel has been actively preparing for a two week trial in this court which was scheduled to proceed on Tuesday, May 8, 2007, and was continued to a date in June. Plaintiff's counsel was also not anticipating having to respond to a motion *in limine* at this early date. Other pressing scheduling demands and unanticipated family obligations over the past week have further interfered with Plaintiff's counsel's ability to complete the Plaintiff's opposition to the pending motions by the existing deadline.

Respectfully submitted,
PLAINTIFF RHONDA HALL
By her Attorney,

Dated: May 11, 2007

/s/ Hugh D. Heisler
Hugh D. Heisler, Esq.
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CERTIFICATE OF SERVICE

I, Hugh D. Heisler, hereby certify that true copies of the foregoing Motion were electronically served upon the attorney of record for the Defendants on May 11, 2007.

/s/ Hugh D. Heisler
Hugh D. Heisler